

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIANG WANG,

Plaintiff,

vs.

THE PHILHARMONIC-SYMPHONY SOCIETY  
OF NEW YORK, INC. AND ASSOCIATED  
MUSICIANS OF GREATER NEW YORK, LOCAL  
802, AMERICAN FEDERATION OF MUSICIANS,  
Defendants.

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: Case No.  
: 1:24-cv-03356 (AS)  
:  
: [rel. 1:24-cv-03348 (AS)]  
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:  
: X

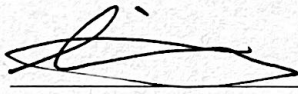
**DECLARATION OF LIANG WANG IN OPPOSITION TO  
DEFENDANTS' MOTIONS TO DISMISS**

LIANG WANG declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the plaintiff in the above-captioned action. I submit this declaration based on my personal knowledge and my review of relevant documents.
2. Attached as Exhibit A is a true and correct copy of an email from Deborah Borda to me, dated September 23, 2024. The top redacted portion reflects privileged communications between me and my counsel.
3. Attached as Exhibit B is a true and correct copy of a memorandum from Deborah Borda to me, dated October 15, 2024.
4. Attached as Exhibit C is a true and correct copy of the Bylaws of the American Federation of Musicians of the United States and Canada, revised September 15, 2023.

I declare under the penalty of perjury that the foregoing is true and correct.  
Dated: New York, New York

July 29, 2025.

  
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Liang Wang